

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: GENERIC PHARMACEUTICALS  
PRICING ANTITRUST LITIGATION**

**MDL 2724  
16-MD-2724**

**THIS DOCUMENT RELATES TO:**

**HON. CYNTHIA M. RUGE**

***ALL ACTIONS***

**ORDER**

**AND NOW**, this 25th day of April 2024, upon consideration of the attached Joint Stipulation Regarding Rule 30(b)(6) Deposition of Taro Pharmaceuticals U.S.A., Inc., it is hereby **ORDERED** that the Joint Stipulation is **APPROVED**.

It is so **ORDERED**.

**BY THE COURT:**

/s/ **Cynthia M. Rufe**

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**CYNTHIA M. RUGE, J.**

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FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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MDL NO. 2724  
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*ALL ACTIONS*

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**STIPULATION REGARDING TRANSCRIPT OF  
RULE 30(b)(6) DEPOSITION OF TARO PHARMACEUTICALS U.S.A., INC.**

WHEREAS, on July 18 and 19, 2023, End-Payer Plaintiffs, Indirect-Reseller Plaintiffs, the States, and Direct Action Plaintiffs (“Stipulating Plaintiffs”) took the deposition of Defendant Taro Pharmaceuticals U.S.A., Inc. (“Taro”) pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure;

WHEREAS, on September 19, 2023, Stipulating Plaintiffs submitted a motion to the Special Masters (the “Motion”) seeking to compel additional Rule 30(b)(6) testimony from Taro directed to Topics 12 and 15 of Stipulating Plaintiffs’ Rule 30(b)(6) notice to Taro;

WHEREAS, on October 13, 2023, Stipulating Plaintiffs requested the deposition of Taro Chief Executive Officer Uday Baldota pursuant to Pretrial Order No. 158 (the “Request”);

WHEREAS, Stipulating Plaintiffs and Taro (the “Parties”) have reached an agreement to strike certain Taro Rule 30(b)(6) testimony in order to resolve the Motion and through which Stipulating Plaintiffs will withdraw the Request;

NOW THEREFORE, in view of the foregoing, the Parties hereby agree and stipulate as follows:

1. The following lines from the transcript of the Taro Rule 30(b)(6) deposition (the "Testimony") shall be stricken from the discovery record:

- 465:19 – 466:22
- 470:7 – 486:6
- 488:1 – 491:7
- 492:1 – 493:14
- 498:24 – 505:16
- 513:18 – 519:2
- 567:20 – 572:5
- 572:24 – 578:5

2. The Testimony shall not be used for any current or future purpose, by Taro or Stipulating Plaintiffs, in the civil actions in MDL No. 2724, including but not limited to in support of or in connection with fact discovery, expert discovery, dispositive motion practice, or trial.

3. Both the Testimony and the balance of the transcript of the Taro Rule 30(b)(6) deposition, and all exhibits therefrom, remain subject to the Second Modified Protective Order (PTO 195) and any successor protective order.

4. Stipulating Plaintiffs agree to withdraw the Motion and the Request, but reserve the right to reinstate the Motion and/or Request, or otherwise pursue additional discovery directed to Topics 12 and 15 of Stipulating Plaintiffs' Rule 30(b)(6) notice to Taro, should Taro use or seek to use the Testimony for any purpose in the civil actions in MDL No. 2724.

5. This Stipulation shall apply only to the Testimony, the Motion, and the Request. All other rights and objections available to the Parties are expressly reserved.

IT IS SO STIPULATED this 18th day of April, 2024.

/s/ Roberta D. Liebenberg

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